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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KELLY STONELAKE, an individual,

Plaintiff,

META Platforms, Inc. a Delaware Corporation

v.

Defendant.

No. 2:25-cy-00474 BJR

STIPULATED MOTION AND ORDER FOR MODIFIED SCHEDULE ON DEFENDANT'S MOTION TO DISMISS AND INITIAL SCHEDULING DATES

I. MOTION

Plaintiff Kelly Stonelake and Defendant META have conferred and hereby submit this stipulated motion requesting that the Court modify the briefing schedule on Meta's pending Motion to Dismiss (Dkt. 11) as follows:

Deadline	Standard Date	Modified Date
Response Date	April 14, 2025	April 28, 2025
Reply Date	April 28, 2025	May 12, 2025

This limited modification of the briefing schedule is necessitated by the complexity of the motion, which moves to dismiss each of Plaintiff's claims and attacks the sufficiency of the

STIPULATED MOTION AND ORDER FOR MODIFIED SCHEDULE ON DEFENDANT'S MOTION TO DISMISS AND INITIAL SCHEDULING DATES - 1 BRESKIN JOHNSON & TOWNSEND 600 STEWART ST. SUITE 901 SEATTLE, WA 98101 1 | a. | 2 | c. | 3 | s. | 4 | b. | 5 | th | 6 | 7 | d | d | d |

allegations throughout the 31-page Complaint, and by pre-planned and unavoidable personal conflicts of both of Plaintiff's counsel during the briefing period, including travel for children's spring break and a house move. The parties conferred about and agreed upon this extended briefing schedule in advance of Defendant filing their Motion, and there is good cause to grant this limited modification of the briefing schedule.

Additionally, the Parties request an extension related to the following dates for the initial disclosures and submission of the Joint Status Report and Discovery Plan (Dkt. 8) such that the deadlines are after the briefing on Meta's pending Motion to Dismiss. The parties agree to abide by the proposed modified dates below even if the Court has not yet issued an order on Meta's pending Motion to Dismiss by the time the modified dates arise:

Modified Date Standard Date Deadline for **FRCP** April 15, 2025 June 2, 2025 **26(f)** Conference **Initial Disclosures Pursuant to** April 22, 2025 June 9, 2025 FRCP 26(a)(1) **Combined Joint Status Report** April 29, 2025 June 16, 2025 and Discovery Plan as Required by FRCP 26(f) and Local Civil **Rule 26(f)**

DATED: April 3, 2025.

BRESKIN JOHNSON & TOWNSEND, PLLC

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By: <u>/s Cynthia Heidelberg</u>
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STIPULATED MOTION AND ORDER FOR MODIFIED SCHEDULE ON DEFENDANT'S MOTION TO DISMISS AND INITIAL SCHEDULING DATES - 2

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STIPULATED MOTION AND ORDER FOR MODIFIED SCHEDULE ON DEFENDANT'S MOTION TO DISMISS AND INITIAL SCHEDULING DATES - 3 BRESKIN JOHNSON & TOWNSEND 600 STEWART ST. SUITE 901 SEATTLE, WA 98101

II. ORDER

BEFORE THE COURT is the parties' stipulated motion for a modified briefing schedule on Meta's pending Motion to Dismiss.

The Court hereby rules as follows: the Stipulated Motion for a Modified Schedule on Defendant's Motion to Dismiss and Initial Scheduling Dates is GRANTED. The briefing schedule is as follows:

Deadline	Standard Date	Modified Date
Response Date	April 14, 2025	April 28, 2025
Reply Date	April 28, 2025	May 12, 2025

Additionally, the following dates for the initial disclosures and submission of the Joint Status Report and Discovery Plan are extended as follows:

	Standard Date	Modified Date
D. W. G. FDCD 46/6	1115 2025	1 2 2025
Deadline for FRCP 26(f)	April 15, 2025	June 2, 2025
Conference		
Initial Disclosures Pursuant to	April 22, 2025	June 9, 2025
FRCP 26(a)(1)		
Combined Joint Status Report	April 29, 2025	June 16, 2025
and Discovery Plan as Required		
by FRCP 26(f) and Local Civil		
Rule 26(f)		

IT IS SO ORDERED this 3rd day of April 2025.

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The Honorable Judge Barbara J. Rothstein

1	Presented by:
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STIPULATED MOTION AND ORDER FOR MODIFIED SCHEDULE ON DEFENDANT'S MOTION TO DISMISS AND INITIAL SCHEDULING DATES - 5 BRESKIN JOHNSON & TOWNSEND 600 STEWART ST. SUITE 901 SEATTLE, WA 98101